



## Full Privacy Notice – Clients/Contracting Parties

### Who we are and what we do with your personal data

AVR Tech S.r.l., headquartered at Via Francesco Tensi, 116 (hereinafter also referred to as the "Data Controller"), is committed to safeguarding the confidentiality of your personal data and ensuring its protection against any event that may put it at risk of breach.

The Data Controller implements policies and practices concerning the collection and use of personal data and the exercise of your rights under applicable data protection laws. These policies and practices are regularly updated whenever necessary, especially in response to regulatory or organizational changes that may affect the processing of your personal data.

The Data Controller has appointed a Data Protection Officer (DPO), whom you may contact for any questions regarding the adopted policies and practices.

DPO Contact Details:

**Colin & Partners S.r.l. a Socio Unico – Alessandro Cecchetti**

Via Privata Maria Teresa, 7

20123 – Milano

Phone. 0287198390

e-mail: [privacy@avrgroup.it](mailto:privacy@avrgroup.it)

### How does the Data Controller collect and process your Data?

The Data Controller collects and/or receives the following information about you:

- First and last name
- Tax code
- Landline and/or mobile phone number
- Physical and electronic address
- IT data (logs)

Your personal information will be processed for the following purposes:

#### 1) Management of the contractual relationship and related legal obligations

The processing of your personal data is carried out to perform all preliminary and subsequent activities related to the management of the established contractual relationship, including payment processing, handling of complaints, and fulfillment of all other obligations arising from the contract, such as the registration and storage of your personal data.

The obligations that the Data Controller must fulfill under the contract and specific regulations governing it include, among others:

- Keeping accounting records

Your personal data is also processed to prevent fraud, including contractual fraud. Finally, your data (such as landline and/or mobile phone number and email address) will be processed to provide you with support regarding the services covered by the contract.

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Share Capital: €10,000.00 fully paid – VAT, Tax Code & Companies Register: No RM 15789971007 – R.E.A. No. 1614201  
Company subject to the management and coordination of AVR S.p.A.

Roma - Firenze – Empoli





Your personal data may also be used to send you specific communications and information related to contractual obligations or deadlines, service delivery methods, or potential operational needs of the company, as well as to inform you about any additional services provided by the Data Controller related to its platforms (soft spam). Without prejudice to the principles of necessity, relevance, and proportionality, such notices may be delivered via paper, telephone (landline or mobile with direct call or SMS), or electronic means (email).

Your personal data may also be collected from third parties, including but not limited to:

- Entities or companies to which the data subject belongs;
- Lists and registers maintained by public authorities or under their authority, or similar entities, based on specific national and/or international regulations;
- IT service providers.

## **2) Disclosure to third parties and recipients**

The processing of your personal data is carried out in connection with the contract and the related legal and/or regulatory obligations.

Your data will not be disclosed to third parties/recipients for their own autonomous purposes unless:

- You provide explicit authorization.

Your data will be disclosed to third parties/recipients when:

- It is necessary to fulfill obligations arising from the contract and from applicable laws and regulations (e.g., for the protection of your rights, reporting to supervisory authorities, etc.);
- The disclosure is made to IT consultants, consultants involved in administrative and accounting management, legal advisors, the parent company of the group to which the Data Controller belongs, the Revenue Agency (AgE), or banking institutions.

## **3) Registration on the Data Controller's platforms**

The processing of your personal data - specifically the data provided voluntarily by you through the registration form on the website, such as:

Identifying personal data (e.g., first name, last name, log data)

is carried out in order to fulfill your request to create a personal account, which is necessary to access and use the services offered by the Data Controller through the available platforms and to access the online portals.

## **4) For IT security activities**

The Data Controller processes your personal data - also through its suppliers (third parties and/or recipients) - to the extent strictly necessary and proportionate to ensure the security and resilience of networks or servers connected to them, at a given level of security, against unforeseen events or unlawful or malicious acts that may compromise the availability, authenticity, integrity, and confidentiality of the personal data stored or transmitted.

To this end, the Data Controller has implemented procedures for managing personal data breaches (data breaches).

## **What Happens If You Do Not Provide Your Data?**

If you do not provide your personal data, the Data Controller will not be able to carry out the processing activities related to the management of the contract and the services connected to it, nor fulfill the obligations arising from them.

The Data Controller may carry out certain processing activities based on specific legitimate interests that do not override your right to privacy, such as those that:

- Allow the prevention of IT incidents and, if necessary, the notification to the supervisory authority or communication to users of personal data breaches;
- Allow the disclosure of data to third parties/recipients for activities related to contract management.



## **How and for How Long Are Your Data Stored?**

### **How**

The processing of data is carried out using paper-based or electronic systems by specifically authorized and trained internal personnel. These individuals are granted access to your personal data only to the extent necessary for carrying out the processing activities that concern you.

The Data Controller periodically reviews the tools used to process your data and the related security measures, ensuring they are constantly updated. It also verifies - through authorized personnel - that no unnecessary personal data are collected, processed, stored, or retained, and that all data are preserved with guarantees of integrity, authenticity, and use strictly for the purposes of the actual processing activities.

### **Where**

The data are stored in paper, electronic, and digital archives located within the European Economic Area (EEA).

### **How Long**

The personal data processed by the Data Controller are retained for the time necessary to carry out activities related to the management of the contract with the Data Controller and for up to ten years after its termination (Art. 2946 of the Italian Civil Code), or from the moment the rights arising from it can be exercised (pursuant to Art. 2935 of the Italian Civil Code). This also includes the fulfillment of obligations (e.g., tax and accounting obligations) that continue even after the contract has ended (Art. 2220 of the Italian Civil Code), for which the Data Controller retains only the data necessary to meet those obligations.

In cases where rights arising from the contract must be asserted in court, your data - only those necessary for such purposes - will be processed for the time strictly necessary to pursue those purposes.

Your right to object at any time to processing based on legitimate interest, for reasons related to your particular situation, remains unaffected.

## **What are your rights?**

At any time, free of charge and without any particular formalities, you may:

- Obtain confirmation of whether your personal data is being processed by the Data Controller;
- Access your personal data and learn its origin (when not obtained directly from you), the purposes and methods of processing, the details of the parties to whom the data is disclosed, the retention period of your data, or the criteria used to determine it;
- Withdraw your consent at any time, if consent is the legal basis for the processing. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal;
- Update or correct your personal data to ensure it is always accurate and up to date;
- Delete your personal data from the Data Controller's databases and/or backup archives if, among other reasons, it is no longer necessary for the purposes for which it was collected, or if the processing is deemed unlawful, provided that the legal conditions for deletion are met; and in any case, if the processing is not justified by another equally legitimate reason;
- Restrict the processing of your personal data in certain circumstances, for example, if you contest its accuracy, for the time necessary for the Data Controller to verify it. You must also be informed, within a reasonable time, when the suspension period has ended or the reason for the restriction no longer applies, and thus the restriction is lifted;
- Obtain your personal data, if received and/or otherwise processed by the Data Controller with your consent and/or if the processing is based on a contract and carried out by automated means, in electronic format, also for the purpose of transmitting it to another data controller.

The Data Controller must act on your request without undue delay and, in any case, no later than one month from the date of receipt. This period may be extended by two additional months if necessary, taking into account the complexity and number of requests received by the Data Controller. In such cases, the Data Controller will inform you within one month of receiving your request and explain the reasons for the extension.

For any further information, or to submit your request, you may contact the Data Controller at the following address: [privacy@avrgroup.it](mailto:privacy@avrgroup.it).



### **How and when can you object to the processing of your Personal Data?**

For reasons related to your particular situation, you may object at any time to the processing of your personal data if it is based on legitimate interest or if it concerns processing activities for which your consent is required, by sending your request to the Data Controller at the following address: [privacy@avrgroup.it](mailto:privacy@avrgroup.it). You have the right to have your personal data erased if there is no overriding legitimate reason that outweighs your request, and in any case, if you have objected to the processing.

### **To whom can you lodge a complaint?**

Without prejudice to any other administrative or judicial remedy, you may lodge a complaint with the competent supervisory authority - specifically, the authority that performs its duties and exercises its powers in Italy, where you have your habitual residence, place of work, or, if different, in the EU Member State where the alleged violation of Regulation (EU) 2016/679 occurred.

Any updates to this privacy notice will be communicated to you promptly and through appropriate means. Likewise, you will be informed if the Data Controller intends to process your data for purposes other than those described in this notice, before doing so and in time for you to give your consent, if required.